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EXECUTIVE SECRETARY

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VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Generic Docket to Establish UNE Prices for Line Sharing per FCC 99-355 and
Riser Cable and Terminating Wire as Ordered in TRA Docket No. 98-00123*
Docket No. 00-00544

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Responses to the Staff Data Requests of September 29, 2000. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 00-00544
Staff's 1st Data Request
September 29, 2000
Item No. 1
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EXECUTIVE SEC

REQUEST: To assist the Authority in its evaluation of outstanding issues in Docket No. 00-00544, Generic Docket to Establish UNE Prices for Line Sharing per FCC 99-355 and Riser Cable and Terminating Wire as Ordered in TRA Docket No. 98-00123, it is requested that you respond to the following:

For Riser Cable and Network Terminating Wire, BellSouth proposed the following elements:

- A.2.14 Sub-Loop Intrabuilding Network Cable Per 2-Wire AVGL
- A.2.15 Sub-Loop Intrabuilding Network Cable Per 4-Wire AVGL
- A.2.19 Sub-Loop – Per Building Equipment Room – CLEC Feeder Facility Setup
- A.15.1 Unbundled Network Terminating Wire Per Pair

At the same time, the Data Coalition proposed the following elements:

- Unbundled Network Terminating Wire (NTW), recurring
- Network Terminating Wire Site Visit – Setup, per Terminal
- NTW Access Terminal Provisioning Including First 25 Pair Panel, Per Terminal
- NTW Existing Access Terminal Provisioning, 2nd 25th Pair Panel, Per Terminal
- NTW Pair Provisioning, Per Pair
- NTW Service Visit, Per Request, Per MDU/MTU Complex.

For the elements listed above, please describe in detail how each element proposed by BellSouth is similar or different from the elements proposed by the Data Coalition.

RESPONSE:

UNTW: Initially, BellSouth set forth the elements listed above by the Data Coalition as part of the UNTW offering. Based on the results of an arbitration proceeding in Georgia, BellSouth has restructured the UNTW offering in all states which is now comprised only of element A.15.1. Therefore BellSouth's A.15.1 element corresponds to the combination of all of the Data Coalition's elements listed above.

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RESPONSE: (continued)

USL-INC: A.2.14, A.2.15, A.2.19 apply to the UNE, Unbundled Sub-Loop – Intrabuilding Network Cable (USL-INC) (a.k.a., riser cable). Additionally, A.2.20 is also required in the set-up for USL-INC. These elements do not apply to UNTW.

REQUEST: For the BellSouth cost element listed in Attachment 1, please describe in detail how each cost element significantly differs from cost elements considered in TRA Docket Number 97-01262, *In Re: Petition Of BellSouth Telecommunications Inc. To Convene A Contested Case To Establish "Permanent Prices" For Interconnection And Unbundled Network Elements*.

RESPONSE: BellSouth's cost study filed in TRA Docket No. 97-01262 included all known Unbundled Network Elements (UNEs) at the time of the filing. In November of 1999 the FCC issued the 319 Remand Order that identified additional UNEs required to further unbundle the network. Because BellSouth did not have Tennessee specific cost studies for these additional UNEs, Exhibit JH-1 (filed on August 18, 2000 with the Affidavit of Jerry Hendrix) was prepared at the TRA's request to provide interim surrogate rates based on cost filings and negotiated rates from interconnection agreements in other BellSouth states. BellSouth's compliance cost study filing dated October 2, 2000 in TRA Docket No. 00-00544 did provide Tennessee specific costs for the additional UNEs identified in the 319 Remand Order that were previously addressed in Exhibit JH-1.

The elements the TRA has listed in Attachment 1 are a partial list of the additional UNEs specified in the 319 Remand Order and were not included in the cost studies filed in TRA Docket No. 97-01262. The cost element structure used by BellSouth utilizes general headings, such as A.3 Loop Channelization and CO Interface (Inside CO), as a means to group similar elements. No cost is associated with these headings; however individuals cost elements under these general headings are associated with a cost. For example, under the A.3 heading cost element A.3.2, CO Channel Interface - 2-Wire Voice Grade was filed in TRA Docket No. 97-01262. Under this same general heading, cost element A.3.17, Unbundled Loop Concentration - POTS Card was filed in TRA Docket No. 00-00544. The latter filing represents additional unbundling required by the FCC per the 319 Remand Order under the A.3 cost element.

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RESPONSE : (Continued)

In summary, the cost elements filed in the two previously referenced TRA Dockets are unique and represent different UNEs. Detailed descriptions of the UNEs are provided in Section 5 of the respective cost study filings for each Docket.

Attachment 1

Note: All cost elements listed below correspond to those found in August 18, 2000 BellSouth interim rate proposal filed in Docket No. 00-00544, *General Docket to Establish UNE Prices for Line Sharing per FCC 99-355 and Riser Cable and Terminating Wire as Ordered in TRA Docket No. 98-00123*.

<u>Cost Element</u>
A.2.44, 45
A.3.12-22
A.5
A.6
A.7
A.8
A.9
A.16.3, 6, 9, 12,14, 17
D.5.7, 8, 10, 11, 13, 14, 16, 17, 19, 21, 23
D.5.9, 12, 15, 18, 20, 22
D.6.1, 2
D.7.1, 2
D.8.1, 2
D.9.1, 2, 4
D.10.1, 2
D.12.1, 2
D.6.3
D.7.3
D.8.3
D.9.3, 5
D.10.3
D.12.3
E.3.7, 8, 9, 10
H.3.1-6

CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

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